

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

GENOVA BURNS, LLC

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Proposed Counsel for Elite Home Products, Inc.,

Debtor-in-Possession

DANIEL M. STOLZ, ESQ.

GREGORY KINOIAN, ESQ.

SCOTT S. REVER, ESQ.

In Re:

ELITE HOME PRODUCTS, INC.,

Debtor-in-Possession.

Chapter 11

Case No. 22-12353 SLM

Hearing Date:

Honorable Stacey L. Meisel

**NOTICE OF MOTION FOR AUTHORIZATION TO MAINTAIN EXISTING
CASH MANAGEMENT SYSTEM**

PLEASE TAKE NOTICE, that on the date specified on the *Order Regarding Application for Expedited Consideration of First Day Matters* the undersigned, as proposed counsel for the Debtors, shall move before the Honorable Stacey L. Meisel, United States Bankruptcy Judge, United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, P.O. Box 3152, Newark, New Jersey 07102, Courtroom 3A, seeking the entry of an Order authorizing the Debtor to maintain its existing cash management system, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is not requested.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, P.O. Box 3152, Newark, New Jersey 07102, and a copy thereof must simultaneously be served upon Genova Burns, LLC Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

PLEASE TAKE FURTHER NOTICE, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

GENOVA BURNS, LLC
Proposed Counsel for Debtor

Date: March 25, 2022

/s/ SCOTT S. REVER
SCOTT S. REVER